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February 12, 2020

By CM/ECF

The Chambers of the Honorable Judge LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-civ-05680-LDH-SJB

Dear Judge DeArcy Hall:

On behalf of Defendant Moira Donegan, and as discussed with the Court at oral argument on February 7, 2020, we provide the Court with excerpts from Plaintiff Stephen Elliott's published works and media appearances that are relevant to the issue of his status as a limited-purpose public figure in this case (attached as Exhibit A).

We also provide a citation to the 2005 Chicago Tribune article that I referenced during that argument, which refers to Mr. Elliott as a literary "rock star." See Ellen Warren, *Stories of a Troubled Man*, Chicago Trib., Mar. 2005, <https://www.chicagotribune.com/nation-world/chi-050427elliott-story.html> (filed at ECF 57-1).

Respectfully submitted,



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